

EXHIBIT C

1 UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY

3 Civil Action No. 22-5887 (RK)(JTQ)

4 JOHN DOE,

5 Plaintiff,

6 vs.

REMOTE VIDEOTAPED

DEPOSITION OF:

ROCHELLE CALHOUN

7 PRINCETON UNIVERSITY,

8 Defendants.

9
10 TRANSCRIPT of the stenographic notes of the
11 proceedings in the above-entitled matter, as
12 taken by and before RITA GARDNER, a Notary
13 Public and Certified Court Reporter of the State
14 of New Jersey, held REMOTELY VIA ZOOM, on
15 Wednesday, October 23, 2024, commencing at 9:33
16 a.m.
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By: THEA POPKO, VIDEOGRAPHER

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1 Q. Okay. In your experience, like do
2 you ever recall a 48-month probation sentence for
3 somebody who was found responsible for what John
4 Doe was found responsible for here at the end of
5 the process?

6 A. I -- I can't recall cases -- with
7 that kind of precision, you know.

8 Q. Okay. Did that finding -- I guess
9 this is jumping ahead, but since we are talking
10 about sanctioning, was that a surprise to you
11 that -- you know, that the finding against him
12 was that he -- Jane Roe said no ten or more times
13 while he non-consensually kissed her, took her
14 clothes off while she continue to say no, and
15 fondled her breast while she continued to say no;
16 was that surprising to you that he was only given
17 probation for that offense?

18 MS. BERMAN: Objection. Form.

19 A. For -- for the things that you have
20 listed that he only got -- this is on the appeal,
21 right, because prior to that it was different,
22 right?

23 BY MR. MUHA:

24 Q. Correct.

25 A. So -- so was it surprising that he

1 only got 48 months of probation for that
2 behavior? I don't recall being surprised.

3 Q. Okay. He also -- I guess I am
4 wondering, do you recall any other cases that
5 you've dealt with where the allegations involved
6 someone saying no ten or more times during the
7 non-consensual activity?

8 A. And being found responsible for
9 that?

10 Q. Yes.

11 A. Right. And getting -- what you are
12 asking me, if I am understanding, is if I recall
13 another case where a similar fact pattern
14 happened, where the individual got just 48 months
15 of probation; am I understanding?

16 Q. Yes.

17 A. I am not recalling another case, no.

18 Q. Do you recall any cases at all,
19 regardless of the actual sanction, where somebody
20 said no, you know, the finding was that the
21 Complainant said no ten or more times during the
22 non-consensual activity, do you remember any sort
23 of factually similar cases to that?

24 A. I -- I am sure that I've had cases
25 where the Complainant has testified or given

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1 took off her clothes while me continued to say
2 no, touched her breasts while she continued to
3 say no. So given all of that, just sitting here
4 today, like, does that strike you as something
5 that should get -- like is it surprising to you
6 that he only got probation?

7 MS. BERMAN: Objection. Form. Lack
8 of foundation.

9 A. He -- up to the taking off clothes,
10 and, you know -- unwanted touching and that is
11 kissing, it is not surprising. And -- and if the
12 -- if the Hearing Panel believed that the
13 Complainant was continuing to say no as the
14 individual was taking off her clothes, I think
15 that is more serious.

16 BY MR. MUHA:

17 Q. Yeah. And so is it surprising that
18 he was only given probation?

19 MS. BERMAN: Objection. Form.

20 BY MR. MUHA:

21 Q. Is it surprising to you just sitting
22 here today?

23 A. One would -- I would think that
24 there could have been more serious -- and in
25 fact, the original sanction was more serious.